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February 9, 2024

**Via ECF Filing:**

The Honorable Arun Subramanian

U.S. District Court for the Southern District of New York

500 Pearl Street

New York, New York 10007

Re: *Hameed v. Egyptair Airlines Company*  
Index No.: 1:23-cv-01757-AS

Dear Judge Subramanian:

The undersigned represents Plaintiff Aamena Hameed (“Plaintiff”) in the above-referenced personal injury action pursuant to the Montreal Convention. Please accept this correspondence as the parties’ joint request to extend the deadline to submit the parties’ joint pretrial filings.

Since the parties last wrote to the Court, we have completed discovery. Neither party plans to file a motion for summary judgment. However, we recently completed several depositions of Defendant’s flight attendants, Rule 30(b)(6) witness, and Plaintiff’s family members, all key fact witnesses, and are awaiting their transcripts.

The Court has imposed a February 12<sup>th</sup> deadline for our Joint Pretrial Order, motions *in limine*, proposed charges, verdict forms, and *voir dire* questions. However, our lack of complete transcripts hinders our ability to properly submit the requested pretrial submissions, as the testimony captured in the missing transcripts could be the subject of several *in limine* topics, and possibly other pretrial filings. We thus respectfully request an **extension of our pretrial submission deadline to March 8, 2024**. This will allow us time to receive the transcripts and complete the required submissions.

SO ORDERED. In addition, lead trial counsel are directed to meet and confer for no less than 30 minutes within the next 14 days on whether there is a path to settlement in this case.



Arun Subramanian, U.S.D.J.

Date: February 9, 2024


Hon. Arun Subramanian, U.S.D.J.

February 9, 2024

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We have conferred with defense counsel Christopher Carlsen, Esq., and he joins in the instant application. Your Honor's courtesies in this matter are greatly appreciated.

Respectfully Submitted,  
BOHRER & LUKEMAN, PLLC

A handwritten signature in black ink, appearing to read "David Zeitzoff". The signature is fluid and cursive, with the first name "David" and last name "Zeitzoff" clearly distinguishable.

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David A. Zeitzoff, Esq.

**Via ECF Filing:**  
cc: Christopher Carlsen, Esq.